

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**Vaughn A. Booker, Esquire
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Philadelphia, Pennsylvania 19102
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Attorney I.D. No: 42312**

Attorney for Debtor

In Re: : Chapter 13 Bankruptcy
U.S. Bank Trust National Association, :
as Trustee of the Preston Ridge Partners
Investments Trust, : No: 16-14084 -AMC
Movant :
vs.
Christopher Atkinson, :
Debtor :
and
William C. Miller, Esquire :
Trustee, :
Respondent :
:

**DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM
AUTOMATIC STAY OF WELLS FARGO BANK, N.A.**

And Now comes the Debtor, Christopher Atkinson, by and through his undersigned Attorney, Vaughn A. Booker, Esquire and in Response to the Motion for Relief from Stay filed by U.S. Bank Trust National Association, as Trustee of the Preston Ridge Partners Investments Trust prays your Honorable Court as follows:

1. Denied. . After reasonable investigation answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph.

2. Admitted in Part and Denied in Part.

2a. After reasonable investigation answering Defendant is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph.

3. Admitted.
4. Admitted in Part and Denied in Part.
5. Denied. To the contrary, the Debtor has made some of his Post Petition payments and is seeking to be current on his Post Petition payments.
6. Denied. It is specifically denied that the Debtor is behind five (5) payments outside the plan as alleged.
7. Denied. It is specifically denied that the Debtor is delinquent in the amount of \$3,276.65 as alleged and specifically denied that the Debtor is behind five post petition payments in the amount of \$3,276.65, as alleged.
8. Denied. No cause exists for the Movant to be granted relief from the automatic stay under 11 USC 362 (d)(1).
9. Denied.
10. Denied.
11. Denied.
12. Admitted.

Wherefore, the Debtor Christopher Atkinson prays your Honorable Court to deny the Creditor's U.S. Bank Trust National Association, as Trustee of the Preston Ridge Partners Investments Trust's Motion For Relief from the Automatic Stay.

By:

/s/ Vaughn A. Booker, Esquire
Vaughn A. Booker, Esquire
Attorney for Debtor

Dated: December 7, 2016

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_____ :

O R D E R

And now to wit, this day of , 2016 and based upon the within Response of the Debtor Christopher Atkinson to the Motion of the Creditor U.S. Bank Trust National Association, as Trustee of the Preston Ridge Partners Investments Trust's, requesting the Relief from the Automatic Stay, it is Hereby Ordered and Decreed that the Motion is Denied.

By the Court:

J.

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Attorney for Debtor

CERTIFICATE OF SERVICE

I, Vaughn A. Booker, Esquire, being duly sworn according to law deposes and says that I served a true and correct copy of the Debtor's Response to the Motion for Relief from the Automatic Stay on the following named parties or their Attorney of record by electronic transmission or regular U.S. Mail, postage pre-paid, as follows:

Brian E. Caine, Esquire
Parker, McCay, P.A.
9000 Midlantic Drive, Suite 300
P.O. Box 5054
Mt. Laurel, New Jersey 08054
Attorney for Creditor
U.S. Bank Trust National Association as Trustee
for the Preston Ridge Partners Investments Trust

William C. Miller, Esquire
111 S. Independence Mall, Suite 583
Philadelphia, Pennsylvania 19106
Chapter 13 Trustee

By:

/s/ Vaughn A. Booker, Esquire
Vaughn A. Booker, Esquire
Attorney for Debtor

Dated: December 7, 2016